

James R. Condo (#005867)
Amanda C. Sheridan (#027360)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren, Suite 1900
Phoenix, AZ 85004-2204
Telephone: (602) 382-6000
jcondo@swlaw.com
asheridan@swlaw.com

Richard B. North, Jr. (admitted *pro hac vice*)
Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station
201 17th Street, NW, Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com

Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF
LODGING UNDER SEAL CERTAIN
EXHIBITS IN SUPPORT OF
BARD'S MOTION FOR SUMMARY
JUDGMENT AS TO PLAINTIFFS
DORIS AND ALFRED JONES'S
CLAIMS**

DORIS JONES and ALFRED JONES, a
married couple,

(Assigned to the Honorable David G.
Campbell)

Plaintiffs,

v.

C. R. BARD, INC., a New Jersey
corporation and BARD PERIPHERAL
VASCULAR, INC., an Arizona
corporation,

Defendants.

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively “Bard”), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6, file this Notice of Lodging Under Seal certain exhibits attached in support of Bard’s Motion for Summary Judgment as to Plaintiffs Doris and Alfred Jones’s Claims. These exhibits—as well as portions of Bard’s Separate Statement of Facts that quote, reference, or characterize them (which Bard is lodging in redacted form)—contain Plaintiffs’ personal healthcare information that is protected under HIPAA and confidential under the Stipulated Protective Order. Defendants have notified Plaintiffs of their intent to file this Notice of Lodging. Because the documents lodged under seal and materials lodged redacted only relate to Plaintiffs’ personal healthcare information, Defendants note that it is Plaintiffs’ burden to file a motion to seal. A list of the exhibits lodged under seal, and a list of materials lodged redacted, are attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED this 28th day of August, 2017.

s/Richard B. North, Jr.
 Richard B. North, Jr.
 Georgia Bar No. 545599
 Matthew B. Lerner
 Georgia Bar No. 446986
 NELSON MULLINS RILEY & SCARBOROUGH, LLP
 Atlantic Station
 201 17th Street, NW / Suite 1700
 Atlanta, GA 30363
 PH: (404) 322-6000
 FX: (404) 322-6050
 richard.north@nelsonmullins.com
 matthew.lerner@nelsonmullins.com

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 Amanda Sheridan (#027360)
 SNELL & WILMER L.L.P.
 One Arizona Center
 400 E. Van Buren
 Phoenix, AZ 85004-2204
 PH: (602) 382-6000
 jcondo@swlaw.com
 asheridan@swlaw.com

**Attorneys for Defendants C. R. Bard, Inc. and
 Bard Peripheral Vascular, Inc.**

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August 2017, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.

Nelson Mullins Riley & Scarborough

LLP
201 17th Street NW, Suite 1700
Atlanta, GA 30363
(404) 322-6000

EXHIBIT A

DOCUMENTS PROPOSED TO BE FILED UNDER SEAL

Defendants request they be permitted to file under seal the following documents in support of their Motion for Summary Judgment as to Plaintiffs Doris and Alfred Jones's Claims:

Exhibit A: Excerpts of Plaintiff Doris Jones's Plaintiff Fact Sheet

Exhibit B: Selected Medical Records of Plaintiff Doris Jones

Exhibit D: Excerpts from March 23, 2017 Deposition of Dr. Anthony Avino

Exhibit E: Excerpts from July 24, 2017 Deposition of Dr. Derek Muehrcke

DOCUMENTS PROPOSED TO BE LODGED REDACTED

Defendants request they be permitted to lodge redacted portions of the following documents:

Defendant's Separate Statement of Facts in Support of Motion for Summary Judgment as to Plaintiffs Doris and Alfred Jones's Claims